

1 to 17

JEROME WASHINGTON  
PLAINTIFF  
v.

Civil Action  
NO. 14-5540

AMENDED COMPLAINT  
BY DEMAND jury TRIAL

John Doe, et al Defendants  
Correctional Officer 1 F. Webster  
Correctional Officer 1 B. Carlson  
Correctional Officer 1 B. Boyd  
Correctional Officer 1 R. Gibbs  
Correctional Officer 1 J. Taylor  
Correctional Officer 1 J. Williams  
Defendants Sued in their Official Capacities  
& individual Capacities

RECEIVED  
JUL 31 2015

Date June 23, 2015  
proof of serve  
certification  
Date 6-23-15

(Fast & Inexpensive) From 4 to 25 ss  
the same claims  
of all other Defendants  
From 25 to 134...  
Civil Complaint

Plaintiff: Hereby verify, His sworn STATEMENT OF OR TESTIMONY OF  
OR AMENDED COMPLAINT IS THE TRUTH & THE Defendants  
into THIS AMENDED COMPLAINT. VIOLATED Plaintiff, 4th 5th  
8th & 14th AMENDMENT RIGHTS. BY Plaintiff Constitutional  
Law. ON MARCH 17, 2013 EXCESSIVE FORCE; WERE Plaintiff  
Become a VICTIM to AN OFFICIAL CERT TEAM PRISON  
ASSAULT. BY THE ABOVE CAPTION Correctional Office.

Plaintiff is The above ENTITLED; Jerome Washington & Defendants  
From John Doe, et al; Have Been IDENTIFIED AS THE ABOVE  
ENTITLED Correctional Officers 1 F. Webster; 1 B. Carlson; 1 B. Boyd;  
1 R. Gibbs; 1 J. Taylor; 1 J. Williams; ALL WHOM REPRESENT THE  
ENTITLED Defendants John Doe, et al Defendants. UPON THIS HEREBY  
VERIFIED INFORMED INFORMATION. ON APPROXIMATELY DATE: JUNE;  
17, 2015 VIA FIRST CLASS MAIL. FROM Defendants ATTORNEY  
GENERAL KATHLEE G. KANE, FOR Plaintiff To Hereby Verify His  
sworn TRUTH of an STATEMENT OF ILLEGAL MEAN NECESSARY.  
FOR AN VIOLATION TO Plaintiff Constitutional Law Rights...

2) Plaintiff HEREBY VERIFY HIS VERIFICATION OF OR TRUE STATEMENT  
OF Claims against Defendants & Hereby Ask the Clerk of Court  
in His AMENDED COMPLAINT... To Have permission of for approval of  
in Grant. To AMENDED COMPLAINT PRESENT INFORMED INFORMATION  
FROM Defendants ATTORNEY. To PRESENT OR OF Change the entitle  
Names above From John Doe's. To Represent as an ENTITLED OF  
OR Names above. To ask For Now on To Be Call the above entitles  
present Names above instead of or John Doe... GRANTED FOR an  
approval To AMENDED COMPLAINT. Form Civil Action No. 14-5540  
By jury Trial. For an penalty of perjury...

ACKNOWLEDGMENT OF CLAIM

3) Defendant's SCI-GRATERFORD PRISON OFFICIAL OR of as  
Correctional Officer's! ON MARCH 17, 2013 Had  
Eligibly played or of their participation as an  
ORGANIZED ORGANIZATION PRISON OFFICIAL security  
team. To Be PRESENT AN ILLEGAL ASSAULT.

1) Defendant; J. Williams 3-17-13 assault Had eligibly played or participated into the organize organization security cent team physical Brutal Force. WHERE Plaintiff was Harm physically From Excessive Force...

2) Defendant; J. Williams 3-17-13 assault For His equal Fairshare of or particular organize part into March 17, 2013 L-Block Cwing 213 Cell Extraction cent team Excessive Force. For Plaintiff's injuries & Damages are sued For Violation to Plaintiff 4<sup>th</sup> 5<sup>th</sup> 8<sup>th</sup> & 14<sup>th</sup> AMENDMENT RIGHTS TO the constitutional Law Rights. For cruel & unusual punishment. By illegal use of force...

3) Defendant; J. Williams 3-17-13 assaultive illegal behavior of or measures were Excessive force. By Defendant J. Williams infamy Brutal Force. for an infamous evil of or assault For Harm & physical Damages. For injuries and of or Damages Mentally physically & emotionally of or pain and suffering....

4) Defendant; J. Williams 3-17-13 assault. Left Plaintiff which is more to bear unreasonable of or critical to withdraw; withstand; of or Plaintiff Flashbacks of an Radical memory of psychological Harm & Damages physically....

5) Defendant; J. Williams 3-17-13 assault were even parts. EVEN if He's not the particular precise one. ON March 17, 2013. Security Video Tape Camera. Defendant; J. Williams assaultive measure's as an organize security cent team use of Excessive Force were part or watch and participated By Not stopping AN illegal assault. For Plaintiff Damages & injuries physically Harm & pain & sufferings...

6) Defendant; J. Williams 3-17-13 played parts as an organized organization AND should have THE same Responsibility even if He's not the assaultive official. But To watch or participate. Now Defendant J. Williams 3-17-13 assault as an security official cent team; WENT IN as an Team. So Defendant J. Williams shared equal parts. For Plaintiff injuries & Damages. plus Plaintiff's pain & suffers...

7) Plaintiff; 3-17-13 were assaulted innocently giving up... WHICH IS Recorded on security Camera. Were Plaintiff's innocently giving up was turn of or than put into an life or Death Situation. From Defendant J. Williams assaultive Measured solution; Excessive Force...

8) Defendant J. Williams was part of an illegal crime Violation. To Plaintiff constitutional Law Rights... As in protect & serve AND Not assault and illegally Beaten. Which Defendant J. Williams 3-17-13 assault presented... Excessive force...

12) Defendant J. Williams 3-17-13 assault Had Fairhair parts into Plaintiff's face. Defendant J. Williams as an CERT team official enter or played parts within an Electrical Shield. To try and shock Plaintiff inside water of C-213 Cell Extraction CERT team attacking of or assaultive Excessive Force action...

13) Defendant J. Williams 3-17-13 assault of or fairhair parts into coming inside L-Block C-wing 2-23 Cell were water was into Deep... Defendant J. Williams as an CERT team official enter or played parts within an Electrical Shield. To try and shock Plaintiff inside water of C-213 Cell Extraction CERT team attacking of or assaultive Excessive Force action...

14) Defendant J. Williams 3-17-13 assault; Plaintiff only escape were to throw items at Electrical Shield. As Plaintiff's EYES were MACE'd twice to Blind vision... By Excessive Force...

15) Defendant J. Williams 3-17-13 assault Had fairhair parts into attacking actions against Plaintiff with an Electrical Shield. As Plaintiff was inputted into an life or death solution of or only way around Electrical Shield into Deep water. Plaintiff Had to Kick water up and moved around Electrical Shield after Mace twice...

16) Defendant J. Williams 3-17-13 assault Had fairhair parts into Grabbing Plaintiff. When Plaintiff confirmed again giving up & was slammed Down Hard on the floor inside water & Handcuffed. Hands & Feet...

17) Defendant J. Williams 3-17-13 assault Had fairhair parts into trying to Drown Plaintiff putting Plaintiff's face under water. As Plaintiff's Hands & Feet are Handcuffed...

18) Defendant J. Williams 3-17-13 assault Had fairhair parts into Plaintiff's Landing Down into Deep water Handcuffed Hands & Feet AND Defendant J. Williams assaultive participation or of part of an action of assault of Punching Plaintiff's face Numerous of times AND Body Kicks of Excessive Force Brutally assaulting Plaintiff for Harm & injuries Damages

19) Defendants J. Williams 3-17-13 assault Had fairhair parts into picking Plaintiff up From off the ground & Body AND penis punches were Thrown to Harm Plaintiff physically for injuries & Damages & for Plaintiff's Pain & sufferings.

20) Defendant J. Williams 3-17-13 assault Had fairhair parts into Slamming Plaintiff's face Numerous times on table inside Cell 2-23. THEN Defendant J. Williams played play part or participated in putting MASK on Plaintiff MACE'd Face & were More Low Blow's penis punches were Thrown...

21) Defendant J. Williams 3-17-13 assault Had fairhair parts into an clothes cut off inside C-216 Cell on L-Block & inputted for an one second shower for another Brutal abusive Attack Low punches into penis..., THEN Placed in Chair 5-hours...

22) Defendant J. Williams 3-17-13 assault Had fairhair parts into Tighten Handcuffs & Bending Plaintiff Hands inside C-223 L-Block Trying to Brake Them after MASK were on Plaintiff Face. Then Defendant's J. Williams play part or participated input Plaintiff in Chair.



32) Defendant J. Williams 3-17-13 assault Had Fairhair parts into Plaintiff affirmatory inputted 3-17-13 & Release 3-22-13... Excessive force Damages inputted Plaintiff affirmatory...

1) Defendant J. Williams 3-17-13 assault Had Fairhair parts into Plaintiff Bleeding from Hemorrhage surgery after 3-22-13 Release from affirmatory Brought Back Internally Bleeding on 3-22-13 & Hemorrhages internal surgery 3-23-13....

24) Defendant J. Williams 3-17-13 assault Had Fairhair parts into later injuries & Damages. Plaintiff Excessive force injuries. By PRISON OFFICIAL CERT TEAM Defendant J. Williams. Plaintiff's Damages are spinal cord slightly curved Medical X-RAY Findings; EYE'S Rip, tear, cuts & Swollen tissue inside EYES & cataract of the EYE'S Lenses... Leg's & Hands Damages & Hemorrhoid Hemorrhages surgery issues of or can't wipe Plaintiff self after use of Bathroom. Plaintiff Has Multiple Multiple Medical Chronic condition of or Medical serious issues, From Defendant J. Williams 3-17-13 Cell Extraction Excessive force... of or assault...

25) Defendant J. Williams 3-17-13 assault Had Fairhair parts into Plaintiff Pain & suffers all day everyday From Back; EYE; Legs; Hands & More after 3-17-13 Damages of or injuries...

26) Defendant J. Taylor 3-17-13 assault Had eligibly played or participated into the organize organization security cert team physical Brutal Force. WHERE Plaintiff was Harm physically From Excessive force...

7) Defendant J. Taylor 3-17-13 assault For His equal Fairhair of or particular organize part into March 17, 2013 L-Block C-WING 243 Cell Extraction Cert Team Excessive force. For Plaintiff's injuries & Damages we sued For violation to Plaintiff 4th 5th 8th & 14th Amendment Rights to the constitutional Law Rights, For cruel & unusual punishment. By illegal use of force...

3) Defendant J. Taylor assaultive illegal behavior of or measure's were Excessive force. BY Defendant J. Taylor infamy Brutal Force. For an infamous evil of or assault For Harm & physical Damages, For injuries and of or Damages mentally physically & emotionally of or pain and suffering...

3) Defendant J. Taylor assault Left Plaintiff Which is more to bear unreasonable of or critical to withdraw; withstand; of or Plaintiff flashbacks of or Radical memory of psychological Harm & Damages physically...

27) Defendant J. Taylor assault were even parts. Even if He's not the particular precise one! on March 17, 2013, security Video Tape camera. Defendant J. Taylor assaultive measure's as an organize security cert team use of Excessive force were part of or watch and participated by Not stopping AN illegal assault. For Plaintiff Damages & injuries physically Harm & pain & sufferings!

30) Defendant J. Taylor 3-17-13 assault played parts as an organized organization AND should Have THE SAME responsibility even if He's Not the assaultive Official, But To watch or participate. Now Defendant J. Taylor 3-17-13 assault as a security Official Cert team, went in as a team. So Defendant J. Taylor Shared as part parts. For Plaintiff injuries & Damages. Plus Plaintiff's Pain & sufferings...

1) Plaintiff 3-17-13 were assaulted innocently giving up... watch is Recorded on security camera. Were Plaintiff's innocently giving up was turn of or THAW put into AN life of Death situation. From Defendant J. Taylor assaultive measured solution; Excessive force...

3) Defendant J. Taylor seen Plaintiff an INNOCENTLY Helplessness person  
INMATE; THAT were giving up Brutally assaulted ~~by~~ By Defendant  
Taylor, As Plaintiff were ~~innocently~~ walking to door gave up But  
not into Defendant's view point J. Taylor illegally made or play parts  
into Plaintiff Being wrongfully illegally Maced twice giving up... Later  
Plaintiff suffers INJURIES...

4) Defendant J. Taylor 3-17-13 assault of or Fair Share parts into coming  
inside L-Block C-wing 2-13 Cell were water was into Deep...  
Defendant J. Taylor as an Cert team OFFICIAL enter or played parts  
within an Electrical Shield, To try an Shock Plaintiff inside water of  
2-13 Cell Extraction Cert team attacking of or assaultive  
Excessive Force action...

5) Defendant J. Taylor 3-17-13 assault Plaintiff only escape were to  
throw items at Electrical Shield. As Plaintiff's EYES were MACED  
twice to Blind vision... By Excessive force...

6) Defendant J. Taylor 3-17-13 assault Had Fair share parts into  
hacking actions against Plaintiff with an Electrical shield. As Plaintiff  
as inputted into an life or Death solution of or only way around  
~~the~~ Electrical shield into Deep water. Plaintiff had to kick water  
up and move around Electrical shield after Mace twice...

7) Defendant J. Taylor 3-17-13 assault Had Fair share parts into Gabbig  
Plaintiff, When Plaintiff confirmed again giving up & was slammed  
Down Hard on the floor inside water & handcuffed hands & feet

8) Defendant J. Taylor 3-17-13 assault Had Fair share parts into trying  
to Down Plaintiff putting Plaintiff's face under water-- As Plaintiff  
Hands & Feet are Handcuffed...

9) Defendant J. Taylor 3-17-13 assault Had Fair share parts into  
Plaintiff Landing Down into Deep water Handcuffed hands & feet AND  
Defendant J. Taylor assaultive participation or of part of an action of  
assault of Punching Plaintiff Face Numerous of times AND Body  
sickens of Excessive Force Brutally Assaulting Plaintiff for Harm  
& Injuries Damages...

10) Defendant J. Taylor 3-17-13 assault Had Fair share parts into  
picking plaintiff up from off the ground & Body AND penis puncher  
were thrown to harm plaintiff physically for injuries & Damages &  
for Plaintiff's Pain & Sufferings...

11) Defendant J. Taylor 3-17-13 assault Had Fair share parts into  
slamming Plaintiff's Face Numerous times on table inside  
Cell 2-13. Then Defendant J. Taylor played play part or  
participated putting MASK on Plaintiff MACED FACE & were  
more low Blows penis punches were Thrown...

12) Defendant J. Taylor 3-17-13 assault Had Fair share parts into  
an clothes cut off inside C-1-26 Cell on L-Block &  
inputted for an one second Shower for another Brutal  
thusive Attack Low punches into penis... Then Placed  
IN Chair 5-hours...

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- 3) Defendant J. Taylor 3-17-13 assault Had FairShair parts into (6) tighten Handcuffs & Bending Plaintiff Hands INSIDE C-2-13 L-Block trying to Brake Them after Mask were ON Plaintiff Face. Then Defendants Taylor play part or participated input Plaintiff IN Chair!
- 4) Defendant J. Taylor 3-17-13 assault Had FairShair parts into Plaintiff Affirmaty inputted 3-17-13 & Release 3-22-13... Excessive Force Damages inputted Plaintiff affirmaty...
- 15) Defendant J. Taylor 3-17-13 assault Had FairShair parts into Plaintiff Bleeding From Hemorrhage surgery after 3-22-13 Release from affirmaty Brought Back! internally Bleeding on 3-22-13 & Hemorrhages internal surgery 3-23-13...
- 6) Defendant J. Taylor 3-17-13 assault Had FairShair parts into later injuries & Damages. Plaintiff Excessive Force INJURIES BY PRISON OFFICIAL CERT TEAM Defendant J. Taylor. Plaintiff's Damages are spinal cord slightly curved Medical X-RAY Findings; EYES Rip, tear, cuts & Swollen tissues inside EYES & catarack of the EYES LENSES... Leg's ~~cut~~ & Hands Damages & Hemorrhoid Hemorrhages surgery issues of or can't wip. Plaintiff self after use of Bathroom. Plaintiff Has Multitude Multiple Medical Chronicl condition of or Medical serious issues. from Defendants J. Taylor 3-17-13 Cell Extraction Excessive Force... of or assault...
- 17) Defendant J. Taylor 3-17-13 assault Had FairShair parts into Plaintiff Pain & Suffer'e's all day every day From Back, EYE, Legs, Hands & more after 3-17-13 Damages of or INJURIES...
- 18) Defendant R. Gibbs 3-17-13 assault Had eligibly played or participated into the organize organization security cert team physical Brutal Force. WHERE Plaintiff was Harm physically from Excessive force...
- 19) Defendant R. Gibbs 3-17-13 assault For His equal FairShair of or part ~~TEAM~~ AR organize part into March 17, 2013 L-Block C-wing 213 Cell Extraction Cert team Excessive Force. For Plaintiff's INJURIES & Damages are sued For Violation to Plaintiff 4th 5th & 14th AMENDMENT RIGHTS To the Constitutional Law Rights. For cruel & unusual punishment. By illegal use of force...
- 20) Defendant R. Gibbs 3-17-13 assaultive illegal behavior of or measure's were Excessive Force. By Defendant R. Gibbs infamy Brutal Force. For an infamous evil of or assault For Harm & physical Damages. For injuries and of or Damages Mentally physically & emotionally of or pain AND suffering. ...
- 21) Defendant R. Gibbs 3-17-13 assault, Left Plaintiff Which is more to bear unreasonable of or critical to withdraw; withstand. of or Plaintiff FlashBacks of an Radical memory of psychological Harm & Damages physically...
- 22) Defendant R. Gibbs 3-17-13 assault were even parts. Even if He's not the particular precise one. ON March 17, 2013. Security Video Tape camera. Defendant, R. Gibbs assaultive measure's as an organize security cert team use of Excessive Force. were part of or of watch and participated By Not Stopping AN ILLEGAL ASSAULT. For injuries physically Harm & pain & sufferings...

3.) Defendant R. Gibbs 3-17-13 played parts as an organized -ganization AND should have THE SAME Responsibility even if e's Not the assaultive Official. But to watch or participate. Now Defendant R. Gibbs 3-17-13 assault as an Security Official Cent team; WENT IN AS AN Team, So Defendant R. Gibbs Share equal parts. For Plaintiff INJURIES & Damages. Plus Plaintiff's pain & Suffer's...

4.) Plaintiff; 3-17-13 were assaulted INNOCENTLY giving up... WHICH IS RECORDED ON Security Camera. Were Plaintiffs INNOCENTLY giving up was TURN OF or THAN put INTO AN life or Death situation. From Defendant R. Gibbs assaultive Measured Solution; EXCESSIVE Force...

5.) Defendant ~~XXXXXX~~ R. Gibbs was part of an illegal crime Violations; Plaintiff Constitutional Law Rights... As INprotect & serve AND NOT ASSAULT AND ILLEGALLY Beaten, WHICH Defendant R. Gibbs 3-17-13 assault presented... EXCESSIVE force...

6.) Defendant R. Gibbs seen Plaintiff an INNOCENTLY Helplessness person or INMATE; THAT were giving up Brutally assaulted By Defendant R. Gibbs. As Plaintiff were INNOCENTLY walking to the door gave up But NOT INTO Defendants view point R. Gibbs ILLEGALLY Made or play parts INTO Plaintiff. Being wrong fully, ILLEGALLY Maced twice giving up... Later Plaintiff Sufferes INJURIES...

7.) Defendant R. Gibbs 3-17-13 assault of or Fairshare parts INTO COMING INSIDE L-Block C-wing 2-13 Cell were water was INTO Deep... Defendant J. Williams as an Cent team Official inter or played parts within an Electrical Shield. To try an Shock Plaintiff INSIDE water of 2-13 Cell Extraction Cent team attacking of or assaultive EXCESSIVE Force action...

8.) Defendant R. Gibbs 3-17-13 assault; Plaintiff only escape were to throw items at Electrical Shield. As Plaintiff's EYES WERE MACED twice to BLIND vision... By EXCESSIVE Force...

9.) Defendant R. Gibbs 3-17-13 assault Had FairShare parts INTO attacking actions against Plaintiff with an Electrical Shield. As Plaintiff was INputted INTO an life or Death Solution of or only way around Electrical Shield INTO Deep water. Plaintiff Had to Kick water up and moved around Electrical Shield after Mace twice...

10.) Defendant R. Gibbs 3-17-13 assault Had FairShare part INTO Sabbing Plaintiff. When Plaintiff confirmed again giving up & was Slammed Down Hard on the Floor INSIDE water & Handcuffed... Hands & Feet...



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- 2) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into trying to Drown Plaintiff putting Plaintiff's face under water. As, Plaintiff Hands & Feet are Handcuffed...
- 3) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Plaintiff's Landing Down into Deep water Handcuffed Hands & Feet AND Defendant R. Gibbs assaultive participation or part of an action of assault of Punching Plaintiff face Numerous of times AND Body Kicks of Excessive Force brutally assaulting Plaintiff for Harm & injuries Damages...
- 4) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Plaintiff up from off the ground & Body AND penis punches were thrown to Harm Plaintiff physically for injuries & Damages & for Plaintiff's Pain & sufferings.
- 5) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into slamming Plaintiff's face Numerous times on table inside Cell -13. Then Defendant R. Gibbs played part or participated putting MASK ON Plaintiff MACE Face & were more Low Blows penis punches were Thrown...
- 6) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Clothes cut off inside C-1-16 Cell on L-Block & inputted for an one second Shower for another Brutal abusive attack punches into penis... Then Placed in Chair 5-hours...
- 7) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Tighten Handcuffs & Bending Plaintiff Hands inside C-213 L-Block trying to Brake Them after Mask were on Plaintiff face. Then Defendant's R. Gibbs play part or participated input Plaintiff in Chair!
- 8) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Plaintiff affirmatory inputted 3-17-13 & Release 3-22-13... Excessive Force Damages inputted Plaintiff affirmatory...
- 9) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Plaintiff Bleeding from Hemorrhage surgery after 3-22-13 Release from affirmatory Brought Back! Internally Bleeding on 3-22-13 & Hemorrhages internal surgery 3-23-13...
- 10) Defendant R. Gibbs 3-17-13 assault Had Fair Hair parts into Later injuries & Damages. Plaintiff Excessive Force injuries By Prison FEDERAL CERT TEAM Defendant R. Gibbs. Plaintiff's Damages, the spinal cord slightly curved medical X-RAY FINDINGS; EYES rip, tear, cuts & swollen tissue inside EYES & Cataract of the EYES Lenses... Legs & Hands Damages & Hemorrhage



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Defendants R. Gibbs 3-17-13 Cell Extraction Excessive Force...  
of or assault...  
Plaintiff self after  
use of Bathroom. Plaintiff has Multiple Medical  
Chronic Conditions of or Medical serious issues. From  
Defendants R. Gibbs 3-17-13 Cell Extraction Excessive Force...  
of or assault...

10) Defendant R. Gibbs 3-17-13 assault Had Hair Shair parts # into  
Plaintiff pain & suffered all day every day From Back; EYE; LEGS;  
Hands & more after 3-17-13 Damages of or injuries...

11) Defendant B. Boyd 3-17-13 assault Had eligibly played or  
participated # into the organize organization security cent  
team physical Brutal Force. WHERE Plaintiff was Harm physically  
from Excessive Force...

12) Defendant B. Boyd 3-17-13 assault For His equal Hair Shair  
For particular organize part # into March 17, 2013 L-Block  
-wing 273 cell Extraction cent team Excessive Fore. For  
Plaintiff's injuries & Damages are sued For Violation to Plaintiff  
1st 5th 8th & 14th AMENDMENT RIGHTS TO the Constitutional Law  
rights. For cruel & unusual punishment. By illegal use of force...

13) Defendant B. Boyd 3-17-13 assaultive illegal Behavior of or  
measures were Excessive Force. By Defendant B. Boyd # infamy  
Brutal Force. For an infamous evil of or assault For Harm &  
physical Damages. For injuries and of or Damages Mentally  
physically & emotionally of or pain AND Suffering...

14) Defendant B. Boyd 3-17-13 assault, Left Plaintiff Which is  
more to bear unreasonable of or critical to withdraw;  
with stand; of or Plaintiff FlashBacks of an Radical memory  
of psychological Harm & Damages physically...

15) Defendant B. Boyd 3-17-13 assault were even parts. Even # P  
He's Not the particular precise one! ON MARCH 17 2013. Security  
Video Tape Camera Defendant B. Boyd assaultive measures as  
an organize security cent team use of Excessive Force were  
part of or watch and participated By Not Stopping AN  
ILLEGAL ASSAULT. For Plaintiff Damages & injuries physically Harm  
& pain & sufferings!

16) Defendant B. Boyd 3-17-13 played parts as an organized  
organization AND Should Have THE SAME Responsibility even  
if He's NOT the assaultive Official. But To watch or  
participate. Now Defendant B. Boyd 3-17-13 assault as an  
Security Official cent team; WENT # in as an team. So  
Defendant B. Boyd Shared equal parts. For Plaintiff injuries  
& Damages. Plus Plaintiff's Pain & Suffering...

17) Plaintiff. 3-17-13 were assaulted # innocently giving up...  
# # # Recoded on security Camera. Were Plaintiff's innocently  
giving up was Turn of or THAN Put # into AN life or Death  
situation. From Defendant B. Boyd assaultive Measured solutions...

Plaintiff constitutional Law Rights... As #N protect & Serve  
AND NOT ASSAULT AND illegally Beaten. WITCH Defendant  
B. Boyd 3-17-73 assault presented... Excessive Force...

79) Defendant B. Boyd seen Plaintiff an #NNOCENTLY Helplessness person or inmate; THAT WERE GIVING up Brutally assaulted By Defendant B. Boyd. As Plaintiff were #NNOCENTLY walking to the door gave up But NOT #Nto Defendant's view point B. Boyd #Nlegally Made or play parts #Nto Plaintiff Being wrongfully illegally MACED twice giving up... Later Plaintiff SUFFERES INJURIES...

80) Defendant B. Boyd 3-17-73 assault of or Fairhair parts #Nto coming #Nside L-Block C-wing 2-73 Cell were water was #Nto played parts within an Electrical Shield. To try an Shock Plaintiff #Nside water of 2-73 Cell Extraction Cert team Attacking or assaultive Excessive force action...

31) Defendant B. Boyd 3-17-73 assault Had Fairhair parts #Nto attacking actions against Plaintiff with an Electrical Shield. AS Plaintiff was #Nputted #Nto an life or Death Solution of or only way around Electrical Shield #Nto Deep water. Plaintiff Had to Kick water up and moved around Electrical Shield after Mace twice...

32) Defendant B. Boyd 3-17-73 assault; Plaintiff only escape were to throw items at Electrical Shield. As Plaintiff's EYES were MACED twice to Blind vision... By Excessive force...

33) Defendant B. Boyd 3-17-73 assault Had FAIRSHAIR parts #Nto Abbing Plaintiff. When Plaintiff confirmed again giving up & was Slammed Down Hard on the Floor #Nside water & Handcuffed... hands & feet...

34) Defendant B. Boyd 3-17-73 assault Had Fairhair parts #Nto trying to Down Plaintiff putting Plaintiff's face under water. AS Plaintiff's Hands & Feet are Handcuffed...

35) Defendant B. Boyd 3-17-73 assault Had Fairhair parts #Nto Plaintiff Landing Down #Nto Deep water Handcuffed Hands & Feet AND Defendant B. Boyd assaultive participations or not part of an action of assault of Punching Plaintiff's face Numerous of times AND Body Kicks of Excessive force Brutally assaulting Plaintiff For Harm & INJURIES Damages...

36) Defendant B. Boyd 3-17-73 assault Had Fairhair parts #Nto Slamming Plaintiff's face Numerous times on table #Nside Cell 2-73. THEN Defendant B. Boyd played parts or participated putting MASK ON Plaintiff MACED FACE & were more low Blows penis punches were THROWN...

in clothes cut off inside C-7-76 Cell on L-Block & ~~input~~ putted for an one second shower for another Brutal abusive Attack ~~on the 10-10-10~~ Low punches into penis... THEN Placed in Chair 5-Hours...

8) Defendant B. Boyd 3-17-73 assault Had FairShair parts into Tighten Handcuffs & Bending Plaintiff Hands inside C-273-Block Trying to Brake Them after MASK WERE ON Plaintiff face. Then Defendant's B. Boyd Play part or participated input Plaintiff in Chair!

9) Defendant B. Boyd 3-17-73 assault Had FairShair parts into Plaintiff affirmatory inputted 3-17-73 & Release 3-22-73... EXCESSIVE Force Damages inputted Plaintiff affirmatory...

1) Defendant B. Boyd 3-17-73 assault Had FairShair parts into Plaintiff Bleeding from Hemorrhagesurger after 3-22-73 Release from affirmatory Brought Back! internally Bleeding on 3-22-73 & hemorrhages internal surgery 3-23-73...

1) Defendant B. Boyd 3-17-73 assault Had FairShair parts into Later injuries & Damages. Plaintiff Excessive Force injuries By Prison OFFICIAL Cent Team Defendant B. Boyd. Plaintiff's Damages are spinal cord slightly curved Medical X-RAY FINDING'S; EYES Rip; ear cuts & Swollen tissue inside EYES & cataract of the EYES LENSESE... Legs & Hands Damages & Hemorrhoid hemorrhages surgery issues of or can't wip Plaintiff self after use of Bathroom. Plaintiff Has Multitude Multiple Medical Chronical condition of or Medical serious issues... From Defendant's B. Boyd 3-17-73 Cell extraction EXCESSIVE Force... OF OR assault...

2) Defendant B. Boyd Had FairShair parts into Plaintiff ~~Back~~ Pain & Suffer's all day everyday From Back; EYE; Leg's; Hands & more after 3-17-73 Damages of or injuries...

3) Defendant B. Carlson 3-17-73 assault Had eligibly played or anticipated into the organize ORGANIZATION security Cent ~~ERM~~ Physical Brutal Force. WHERE Plaintiff was Harm physically from EXCESSIVE Force...

4) Defendant B. Carlson 3-17-73 assault Forth's equal FairShair For particular organize part into March 17, 2013 L-Block wing 273 Cell Extraction Cent team EXCESSIVE Force. For Plaintiff's injuries & Damages are sued For Violation To Plaintiff 4<sup>th</sup> 5<sup>th</sup> 8<sup>th</sup> & 14<sup>th</sup> AMENDMENT RIGHTS TO the CONSTITUTIONAL Law Rights. For ~~a~~ cruel & unusual punishment by illegal use of Force...



15) Defendant B. Carlson 3-17-13 assaultive behavior for measure's were Excessive Force. By Defendant B. Carlson Intend Brutal Force. For an infamous evil of or assault for harm & physical Damages. For injuries of or Damages Mentally physically & Emotionally of or pain AND Suffering...

16) Defendant B. Carlson 3-17-13 assault. Left Plaintiff with it is more to bear unreasonable of or critical to withdraw; withstand; of or Plaintiff Flashbacks of an Radical memory of psychological Harm & Damages physically...

17) Defendant B. Carlson 3-17-13 assault were even parts. Even if he's not the particular precise one! on March, 17, 2013. Security Video Tape Camera. Defendant B. Carlson assaultive measures as an organize security cert team use of Excessive Force; were part of or watch and participated By Not Stopping AN illegal assault. For Plaintiff Damages & injuries physically Harm & pain & sufferings!

18) Defendant B. Carlson 3-17-13 played parts as an organized organization AND should have the same responsibility even if he's NOT the assaultive official. But To WATCH or participate Now Defendant B. Carlson 3-17-13 assault as an security official Cert team; WENT IN AS AN Team. So Defendant B. Carlson Shared equal parts. For Plaintiff injuries & Damages. Plus Plaintiff's pain & Suffer's...

19) Plaintiff; 3-17-13 were assaulted innocently giving up... which is Recoded on security Camera. WERE Plaintiff's innocently giving up was Turn of or THAN put into a life or Death Situation. From Defendant B. Carlson assaultive measured Solution; Excessive Force...

20) Defendant B. Carlson was part of an illegal crime Violations. To Plaintiff Constitutional Law Rights... As in protect & Serve AND NOT ASSAULT and illegal Beaten. Which Defendant B. Carlson 3-17-13 assault presented... Excessive Force...

21) Defendant B. Carlson seen Plaintiff an innocently Helplessness version of INMATE; THAT were giving up Brutally assaulted By Defendant B. Carlson. As Plaintiff were innocently walking to the door gave up But NOT into Defendant's view point B. Carlson illegally Made or play parts into Plaintiff Being wrongfully illegally MACED twice giving up... Later Plaintiff suffers injuries...

22) Defendant B. Carlson 3-17-13 assault of or Fair share parts into coming inside L-Block C-wing 2-13 Cell were water was into Deep... Defendant B. Carlson as an Cert team official INTER or played parts within an Electrical Shield. To try an Shock Plaintiff inside water of 2-13 Cell Extraction Cert team attacking of or assaultive Excessive Force action...

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to throw items at Electrical Shield, As Plaintiff ~~was~~ EYE'S were  
MACED twice to Blind Vision... By Excessive Force...

104S Defendant B. Carlson 3-17-13 assault Had FairShare parts  
into attacking actions against Plaintiff with an Electrical Shield.  
As Plaintiff was inputted into an Life or Death Solution of  
or only way around Electrical Shield into Deep water.  
Plaintiff Had to Kick water up and Moved around Electrical Shield  
after Mace twice...

105S Defendant B. Carlson 3-17-13 assault Had FairShare parts into  
~~was~~ Grabbing Plaintiff, When Plaintiff confirmed again giving up &  
was Slammed Down Hard on the floor inside water &  
Handcuffed... Hands & FEET'S...

106S Defendant B. Carlson 3-17-13 assault Had FairShare parts into  
trying to Drown Plaintiff putting Plaintiff's face under water.  
As Plaintiff's Hands & Feet are Handcuffed...

106S Defendant B. Carlson 3-17-13 assault Had FairShare parts into  
Plaintiff's Landing Down into Deep water Handcuffed Hands  
& Feet AND Defendant B. Carlson assaultive participation  
or of part of an action of assault of Punching Plaintiff's Face  
Numerous of times AND Body Kickers of Excessive Force Brutally  
assaulting Plaintiff for Harm & injuries Damages.

107S Defendant B. Carlson assault Had FairShare parts into picking  
Plaintiff up from off the ground & Body AND penis punches  
were Thrown to Harm Plaintiff physically for injuries &  
Damages & For Plaintiff's Pain & Sufferings.

108S Defendant B. Carlson 3-17-13 assault Had FairShare parts  
into Slamming Plaintiff's Face Numerous times on table inside  
cell 2-13. THEN Defendant B. Carlson played ~~part~~ part or  
participated putting Mask on Plaintiff MACED FACE & were  
MORE Low Blows PENIS punches were Thrown...

109S Defendant B. Carlson 3-17-13 assault Had FairShare parts into  
an clothes cut off inside C-7-26 Cell on L-Block & inputted  
for an one second Shower for another Brutal abusive Attack  
Low punches into penis... THEN Placed in Chair 5-Hours...

110S Defendant B. Carlson 3-17-13 assault Had FairShare parts  
into Tighten Handcuffs & Bending Plaintiff Hands inside  
C-213 L-Block Trying to Brake Them after Mask were on  
Plaintiff Face. Then Defendant's B. Carlson play part or  
participated input Plaintiff in Chair!

111S Defendant B. Carlson 3-17-13 assault Had FairShare parts  
into Plaintiff affirmatory inputted 3-17-13 & Release 3-22-13..  
Excessive Force Damages inputted Plaintiff affirmatory...

112) Defendant B. Carlson 3-17-13 assault Had Fair Share parts into Plaintiff Bleeding from Hemorrhage surgery after 3-22-13 Release from affirming Brought Back. internally Bleeding on 3-22-13 & Hemorrhages internal surgery 3-23-13...

113) Defendant B. Carlson 3-17-13 assault Had Fair Share parts into after injuries & Damages. Plaintiff Excessive Force injuries By ITISON OFFICIAL CERT TEAM DEFENDANT B. Carlson. Plaintiff's Damages are spinal cord slightly curved Medical X-RAY FINDINGS; EYE'S R&P, tear, cuts & swollen tissue inside EYE'S & Cataract of the EYE'S lenses... Legs & Hands Damages & Hemorrhoid Hemorrhages surgery issues of or can't wipe Plaintiff self after use of Bathroom. Plaintiff Has Multitude Multiple Medical Chronical condition of or Medical serious issues. From Defendant B. Carlson 3-17-13 Cell Extraction Excessive Force... of or assault...

114) Defendant B. Carlson 3-17-13 assault Had Fair Share parts into Plaintiff Pain & Sufferes all day every day From Back; EYE; Legs; Hands & more after 3-17-13 Damages of or injuries...

115) Defendant F. WEBSTER 3-17-13 assault Had eligible played or participated into the organize organization security cent team physical Brutal force. WHERE Plaintiff was Harm physically From Excessive Force...

116) Defendant F. WEBSTER 3-17-13 assault For His equal Fair Share of or particular organize part into MARCH 17, 2013 C-Block C-wing 2-13 Cell Extraction cent team Excessive force. for Plaintiff's injuries & Damages are sued for Violation to Plaintiff 4th 5th 8th & 14th AMENDMENT RIGHTS to the Constitutional Law RIGHTS. For cruel & unusual punishment. BY illegal use of force...

117) Defendant F. WEBSTER 3-17-13 assaultive illegal behavior of or measures were Excessive Force. By Defendant F. WEBSTER infamy Brutal Force. For an infamous evil of or assault for Harm & physical Damages. for injuries and of or ~~assault~~ Damages mentally physically & Mentonally of or pain and suffering...

118) Defendant F. Webster 3-17-13 assault; Left Plaintiff WHICH is more to bear unreasonable ~~assault~~ of or critical to withdraw withstand; of or Plaintiff Flashbacks of an Radical memory of psychological Harm & Damages physically...



Defendant F. WEBSTER 3-17-13 assault were even parts. Even  
= He's NOT the particular precise one. ON March 17 2013 - Security  
to tape camera. Defendant F. WEBSTER assaultive measures as an organize  
Security cert team use of Excessive Force were part of a  
WATCH AND participated By NOT STOPPING AN ILLEGAL assault. For  
Plaintiff Damages & Injuries physically harm & Pain & sufferings.

01) Defendant F. WEBSTER 3-17-13 played parts as an organized  
organization AND should have the same Responsibility even if he's  
not the assaultive official. But to watch or participate. Now  
Defendant F. WEBSTER 3-17-13 assault as an Security official  
cert team; WENT IN as a team. So Defendant F. WEBSTER shared  
equal parts. For Plaintiff Injuries & Damages. Plus Plaintiff's  
Pain & Suffer's...

21) Plaintiff; 3-17-13 were assaulted innocently giving up... With  
s Recalled on Security Camera. Were Plaintiffs innocently giving  
up was turn of for TRANPUT INTO a life or Death Situation.  
from Defendant F. WEBSTER assaultive measures Solution;  
EXCESSIVE FORCE...

22) Defendant F. WEBSTER was part of an illegal crime Violation. To  
Plaintiff Constitutional Law Rights... As in protect & serve AND NOT  
assault and illegally Beaten. Which Defendant F. WEBSTER 3-17-13  
assault presented... EXCESSIVE force...

23) Defendant F. WEBSTER SEEN Plaintiff an innocently Helplessness  
PERSON or INMATE; THAT were giving up Brutally assaulted By  
Defendant F. WEBSTER. AS Plaintiff were innocently walking to the  
door gave up But NOT INTO Defendant's view point F. WEBSTER  
illegally MADE or play parts INTO Plaintiff Being wrongfully  
illegally MACE twice giving up... Later Suffer's Injuries...

23) Defendant F. WEBSTER 3-17-13 assault of or Fair Share parts INTO  
being inside L-Block C-wing 2-13 cell were water was INTO  
Deep... Defendant F. WEBSTER as a Cert team official enter or  
played parts within an Electrical Shield. To try an Shock  
Plaintiff inside water of 2-13 Cell Extraction Cert team  
attacking of or assaultive Excessive Force action...

24) Defendant F. WEBSTER 3-17-13 assault Had Fair Share parts INTO  
attacking actions against Plaintiff with an Electrical Shield. AS  
Plaintiff was inputted INTO a life or Death Solution of or only  
way around Electrical Shield INTO Deep water. Plaintiff Had to Kick  
water up and moved around Electrical Shield after MACE twice...

25) Defendant F. WEBSTER 3-17-13 assault Plaintiff only escape were  
to throw items at Electrical Shield. AS Plaintiff's EYE'S were  
MACE twice to Blind vision... By EXCESSIVE force...

26) Defendant F. WEBSTER 3-17-13 assault Had Fair Share parts INTO  
subbing Plaintiff. When Plaintiff confirmed again, giving up & was  
slammed Down Hard on the Floor inside water & Handcuffed...  
Hands & Feet...

127.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Plaintiff's Landing Down into Deep water Handcuffed Hands & Feet AND Defendant F. WEBSTER assaultive participation or of part of an action of assault of Punching Plaintiff's Face Numerous of times AND Body Kicks of Excessive Force Brutally assaulting Plaintiff for Harm & INJURIES Damages...

128.) Defendant's F. WEBSTER 3-17-13 assault Had FairShair parts into picking Plaintiff up from off the ground & Body AND penis punches were Thrown to Harm Plaintiff physically for INJURIES & Damages & For Plaintiff's PAIN & Sufferings...

129.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Slamming Plaintiff Face Numerous times on table inside Cell L-13. THEN Defendant F. WEBSTER played part or participated putting MASK on Plaintiff MACE FACE & were more low Blows penis punches were Thrown...

130.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into in Clothes cut off inside C-216 Cell on L-Block & inputted For an second Shower For another Brutal abusive Attack Low punches into penis... THEN Placed in Chair 5-hours...

131.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Tighten Handcuffs & Bending Plaintiff Hands inside C-213 L-Block Trying to Brake Them after MASK were on Plaintiff Face. THEN Defendant's F. WEBSTER play part or participated input Plaintiff in Chair!

132.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Plaintiff affirmatory inputted 3-17-13 & Release 3-22-13... EXCESSIVE Force Damages inputted Plaintiff affirmatory...

133.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Plaintiff Bleeding From Hemorrhage surgery afte 3-22-13 Release, From affirmatory Brought Back! internally Bleeding on 3-22-13 & Hemorrhages internal surgery 3-23-13...

133.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Later INJURIES & Damages - Plaintiff Excessive Force INJURIES BY PRISON OFFICIAL CERT TEAM Defendant F. WEBSTER. Plaintiff's Damages are spinal cord slightly curved Medical X-RAY Findings; EYE'S Rip, tear, cuts & Swollen tissue inside EYES & cataract of the EYE'S Lenses... Legs & Hands Damages & Hemorrhoid Hemorrhages surgery issues of for can't wip Plaintiff self after use of Bathroom... Plaintiff Has Multiple Multiple medical Chronical condition - of or Medical serious issues - From Defendant F. WEBSTER 3-17-13 Cell Extraction Excessive Force of or assault...

134.) Defendant F. WEBSTER 3-17-13 assault Had FairShair parts into Plaintiff Pain & Sufferes all day everyday From Back; EYE, Legs, Hands & more after 3-17-13 Damages of or INJURIES...

135) Defendant J. Williams are Being sued in His Official Capacities & individual capacities For \$1,000,000 Dollars/ONE MILLION DOLLARS. For penalty of perjury...

136) Defendant J. Taylor are Being sued in His Official Capacities & individual capacities For \$1,000,000 Dollars/one MILLION Dollars. For penalty of perjury...

137) Defendant R. Gibbs are Being sued in His Official Capacities & individual capacities For \$1,000,000 Dollars/one MILLION DOLLARS. For penalty of perjury...

138) Defendant B. Boyd are Being sued in His Official Capacities & individual capacities For \$1,000,000 Dollars/one MILLION DOLLARS. For penalty of perjury...

139) Defendant B. Carlson are Being sued in His Official Capacities & individual capacities. For \$1,000,000 Dollars/ONE MILLION DOLLARS. For penalty of perjury...

140) Defendant F. WEBSTER are Being sued in His Official Capacities & individual capacities. For \$1,000,000 Dollars/ONE MILLION DOLLARS. For penalty of perjury...

141) Defendants all above are sued each for their part in particular Dated 3-17-13 / MARCH 17, 2013 Cell Extraction Excessive Force & IP plaintiff input All of or what eligible happen would be more than an 100 pages. of or issued Prisoner Rights Complaints...

142) Plaintiff Have Been pro-se litigant into this lawsuit of prisoner complaint 1983 Form against SCT-CRATERFORD Correctional Institutional Official. For penalty of perjury...

143) Plaintiff Haven't Receive property Case Claim so as He's already informed the courts on May 11 2015... conference phone call & Had Been still upon awaiting property law material Legal Documents & other important information into His Claims of or suit against Defendant above Entitles...

144) Plaintiff Hereby Verify This is the same TRUTH Statement of Claims pro-se litigant against the illegal wrongful Excessive Force Cert team Defendants present March 17, 2013 and informed identification on June 17, 2015... Names of Defendants sued For penalty of perjury...

Sworn Plaintiff: Jerome Washington HV0282 SCT-CRATERFORD  
Date 6-23-15. Jerome Washington P.O. Box 244  
GRATERFORD, PA 194260244



Jerome Washington #00282

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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA, PA 19106-1797

U.S. M.S.  
X-RAY